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April 23, 2008

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Hon. Paul A. Crotty
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 735
New York, New York 10007-1581

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Re: **Thelma Shipping Co. Ltd. v. Beijing Shou-Rong Forwarding Service Co. Ltd.**
Docket # 08 Civ. 01804 (PAC)
- Plaintiff's Request for an extension of time to submit opposition papers

Dear Judge Crotty:

We are attorneys for the Plaintiff in this admiralty action brought pursuant to Supplemental Admiralty Rule B of the Federal Rules of Civil Procedure. We write to request an extension of time to submit Plaintiff's opposition papers to Defendant's Motion for Countersecurity for two (2) business days.

Your Honor originally set a deadline of April 24, 2008 for Plaintiff's opposition papers. However, until very recently, it appeared that the parties would amicably settle the security issues now before the Court. We were only recently informed by English counsel that the negotiations had fallen through.

As it was believed that the parties were settling the security issues, substantive advice from Plaintiff's English solicitors was not forthcoming. We now need time to review the detailed advice recently received from London and prepare final declaration(s) to submit with the opposition papers. Thus, as set forth above, we request that Plaintiff be allowed two additional business days to submit its opposition to the Motion for Countersecurity (making the new deadline Monday April 28, 2008).

We submit, given the very short length of the extension requested, that Defendant would suffer no prejudice from this request. However, we note that upon request Defendant's counsel could not consent to the extension.

In light of the foregoing, Plaintiff respectfully requests that the Court adjust the briefing schedule and allow it two additional business days to submit its opposition papers.

This is Plaintiff's first request for an extension.

MEMO ENDORSED

MEMO ENDORSED

Should your Honor have any questions or comments we are available to discuss the same at any convenient time to the Court. We thank your Honor for consideration of this request.

Respectfully Submitted,

Nancy R. Siegel (Peterson)

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Holland & Knight LLP

*L-7 Response by 4/28/08
*L-7 Reply by 5/5/08
*SO ORDERED: 4/25/08

HON. PAULA A. CROTTY
UNITED STATES DISTRICT JUDGE